

Exhibit L

Steven Morigi

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
STEVEN MORIGI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF COLORADO)

: SS.:

COUNTY OF JEFFERSON)

STEVEN MATTHEW MORIGI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6920 West 109th Street, Apt. 312, Westminster, CO 80020.

2. I am currently 34 years old, having been born on February 16, 1988.

3. I am the son of Paul Steven Morigi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from pulmonary fibrosis on May 14, 2010 at the age of 60. It was medically determined that my father's illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was a great father. He was my baseball coach growing up and would always attend my baseball and football games. In later years, we would go to concerts together and out to dinner in the City on a regular basis. I was only 22 at the time my father passed away. At the time, I was finishing college at the University of Colorado, Boulder. Upon returning from the college's commencement ceremonies, I saw my father one more time before he passed away later that evening. My dad inspired me and encouraged me to study hard and was very involved

in my college selection process. He had attended the University of Michigan, and a strong work ethic was very important to him. Dad was so proud of his school, and he wanted me to have a good college experience as well.

6. At the time of September 11, 2001, I was thirteen years old and was in the 8th grade. At school, we didn't know too much about what happened. On 9/11, I rode my bike home from school and my dad was already home by the time I returned. When I saw my dad, he began to describe the horrors of what had occurred. First, he was covered in dust from head to toe and the front pocket of his shirt was filled with soot. Dad said that he ran from his work and, with some other people, hid behind one of the giant yellow barrels on the road by battery city tunnel. From there, my dad made it to New Jersey, where my mom picked him up in Morristown. Once they reopened the PATH train to the World Trade Center, he would take that to work and would have to see all of the devastation on the way to the stock exchange, including the smell and the thickness of the air from the debris and construction surrounding Ground Zero. My dad continued working there until I was well into college.

7. When I think about the impact that 9/11 had on my dad, I feel that the changes in his health from before and after are readily apparent. It definitely impacted him. My dad loved the outdoors, gardening, and hiking. Sadly, he couldn't do those activities over the years due to his many breathing issues. Instead, my dad had friends help him in the garden and would hire people to do some of the work because he still wanted to be active and do things but knew he couldn't. Occasionally, dad would come out to Colorado to visit me in college, but I could see he was suffering due to the high altitude and his breathing issues.

8. I knew he was sick for some time because my dad would see doctors on a regular basis. Since he was a private man, there were still a lot of details he didn't share. As a result, I didn't know that there was a particular diagnosis; however, I knew his respiratory condition was more serious. In addition to the traditional inhaler, like albuterol for asthma, my dad was also prescribed Advair, which is typically prescribed for COPD. It was disheartening to watch my dad's ability to do things decline because he used to spend so much time outdoors. Actually, both my parents were quite active. We used to go to Vermont on family trips, while I would go to the mountain for downhill skiing, my parents would go cross-country skiing. But, due to his illness, my dad was a much less active person. Essentially, because of the breathing issues, he

would sit in the recliner, watching documentaries, or golf, or read his book. Cross-country skiing was out, as the cold weather was not comfortable for him and his activities became much more limited.

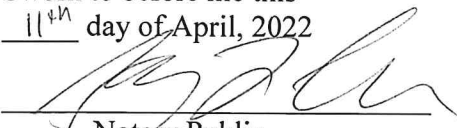
9. In my childhood, my dad and I would see the Yankees all the time; however, by the time I was in high school if we wanted to go to a Yankees game or a Jets game, we had to make sure the weather was right. We wouldn't go to summer games for baseball or winter games for football because the weather extremes would create so many problems for dad. It was painful to watch as dad wasn't able to share in all of our favorite pastimes. We used to go to street fairs and festivals in the City, but then he shied away from that because the smells in the air would cause flare-ups. For the most part, activities with my dad became more sedentary.

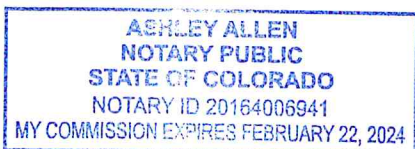
10. Dad's declining health had a huge financial impact on me and my family. My dad was on the trading floor of the American Stock Exchange for over 30 years, where he made friends personally and professionally. Unfortunately, it became harder and harder for him to work there because of the breathing issues. He had to run around the floor while carrying multiple inhalers. Traveling into the City, the stress of seeing everything from 9/11, as well as dealing with all the smog that was floating around there became too much. I think this contributed to my dad's losing his job shortly before his death, leaving a substantial financial burden on us.

11. Paul Morigi was a great man who did a lot for us and definitely left us too soon because of his condition. I miss him terribly and lost so much from his premature death.


STEVEN MORIGI

Sworn to before me this
11th day of April, 2022


Notary Public



commission expires February 22nd 2024³
sworn to me in Arapahoe county,
Colorado

Mary Marcelline Morrissey

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF MARY
MARCELLINE MORRISSEY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:

COUNTY OF WESTCHESTER)

MARY MARCELLINE MORRISSEY, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 2 Peck Avenue, Apt. 21A, Rye, New York 10580.

2. I am currently 68 years old, having been born on July 6, 1953.

3. I am the wife of John Patrick Morrissey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from pulmonary fibrosis and colon cancer on February 25, 2014. It was medically determined that his illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I had a wonderful relationship. We always had fun together. We had an untraditional love story. We dated, were apart for nearly twenty years, during which time

I went into the Air Force, got married, and had children. Then, after my divorce, we reconnected, picked up right where we left off, and got married in 2003. We merged our families, and John embraced my children as his own. We loved to travel and go on cruises. John was the life of the party and loved to plan social activities for us to do.

6. On 9/11, John was a retired firefighter with the FDNY. He quickly jumped in to help first responders wherever he could. He went down to near the World Trade Center to hand out waters. He was on the ground helping for nearly two weeks. He wanted to help his brothers and volunteered through his various brotherhoods.

7. Following 9/11, my husband started slowing down significantly, which was the first sign that something was wrong. John and I always liked to take long walks along the Hudson River. He was always able to walk quickly, but suddenly he could barely keep up with me. I thought he was joking at first, but then I noticed that he wasn't breathing right. I encouraged him to visit a doctor. He was sent to a series of specialists who recommended that he use portable oxygen. Things got worse from there. He began to have trouble walking short distances. He constantly needed more oxygen. He couldn't go anywhere without his oxygen. Next, they found something suspicious on his colon and had to perform surgery. I thought it was something routine, but the surgery lasted over five hours. The doctor told us that John had cancer and that he had removed it during surgery. I was in shock. By 2010, we had to move to single floor living with elevator access because he couldn't take the stairs anymore. John was fully dependent on portable oxygen. He couldn't freely go out with friends and family anymore. In 2011, we took our last trip together on a European cruise. He got sick on the ship. He couldn't breathe. He couldn't eat. He had to go to the infirmary to get more oxygen. We ended up having to leave the ship early and take a medical escort home. It was a sad wake up call to the life that

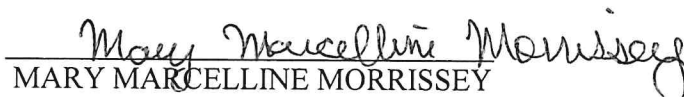
we weren't going to be able to live any longer. He never bounced back. In 2014, he collapsed on a marble floor, passed out, turned blue, and broke his nose. I called 911, and an ambulance came and took him to Vassar to run tests. They told him they didn't know how much time he had left. This news devastated me. How could this be happening? We were supposed to have enough time to make up for our years apart! We tried to enjoy whatever time we did have left and stayed in watching movies and being together as much as we could for as long as we could. A week after his fall he was gone.

8. John's illness and death had a huge emotional impact on me. I felt like I was playing two roles – loving wife on the one hand and caretaker on the other. My husband needed constant supervision and reminders to bring his oxygen, to make sure he had enough oxygen, to refill his oxygen, and to slow down so he didn't run out of oxygen. Our lives revolved around oxygen. There were times where he would run out of oxygen, pass out on the floor, and only come to after someone found him. I remember he fell in the hallway once, and our neighbor came banging on our door because he had passed out and needed help. In the end, he struggled to remember his medications and keep track of his appointments. I watched his mobility decline and him labor to get to and from the car. It was exhausting to worry about him running out of air or forgetting to take his medicine or missing an appointment and having him rely on me to remind him about everything. I hated to see that he couldn't do even little things that he wanted to do, like enjoy a corned beef sandwich, because he didn't have enough oxygen to go to the restaurant and back in the dead of winter. It was sad to see him become angry and irritable when he couldn't live the life he wanted to live anymore. It is heartbreaking to think of our love story cut short. In 2013, we went to our last annual Christmas dance together, our favorite annual event. John was so weak that he couldn't even stand for short periods of time. He was so

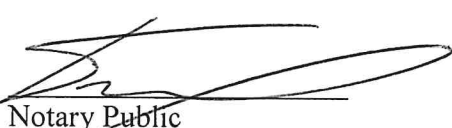
determined that we dance to our favorite song, *The Wonder of You* by Elvis Presley, but he could only stand for one bar before he became too exhausted. John was my love and my hero, and watching him become so vulnerable and dependent on me was emotionally draining.

9. My husband's health issues impacted us financially as well. We had to move to a home with a different layout and no stairs further away from family. We had to drastically change our lifestyle. We could no longer travel together and had to use a medevac from our last trip together, which was extremely expensive.

10. John died on his birthday – February 25th. I like to think there is some poetic justice to him leaving this earth on the same day that he arrived and no longer having to struggle to hang on. I only had a short time with him, but he was the absolute love of my life, and I am grateful for all the days, months and years we had together. I miss him every moment of every day. Forever with him wouldn't have been long enough for me.


MARY MARCELLINE MORRISSEY

Sworn to before me this
16th day of May, 2022


Notary Public

DREW ALEXANDER
Notary Public of New York
I.D. 01AL641646
COMMISSION EXPIRES 03/01/2025

Catherine M. Trotta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
CATHERINE M. TROTTA**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

CATHERINE M. TROTTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 59 Appleby Drive, Bedford, New York 10506.
2. I am currently 58 years old, having been born on February 24, 1964.
3. I am the daughter of John Patrick Morrissey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from pulmonary fibrosis and colon cancer on February 25, 2014. It was medically determined that his illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I had an incredibly close relationship with my dad, as I was his only child. Even though my parents divorced when I was two years old, I always lived close to my dad and saw

him multiple times per week. He was very involved in my life and loved by all my friends. When I had children of my own, I grew even closer to my dad. He was there in the hospital when my two girls were born. He was the best grandfather to my girls and would take my kids to museums, carnivals, and sleepovers. He loved spending time with them and would visit my house often to babysit them. He loved taking vacations with me and my kids, and I remember fond times going to Disney World together. My dad grew up as an orphan, so it was very important for him to be close to his own family and be really present. He treated family as a priority.

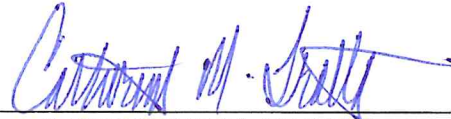
6. Following 9/11, my dad immediately went down to volunteer, handing out water, and supporting his fellow firefighters. He lost many close friends as a result of the terrorist attacks and wanted to support his brothers. He was committed to public service and was actively involved in community organizations like the Anchor Club.

7. When he got sick, my father changed. Before 9/11, he was very active and loved to walk along the Hudson. I remember running after him as a child just to keep up and begging him to slow down. I would sing a song called *Daddy Don't You Walk So Fast* because I thought it was funny how quickly he would walk. Suddenly, after 9/11, he slowed down. He had trouble breathing and needed oxygen and inhalers. He could no longer travel or do social activities freely. My dad loved life and was the life of the party. He was incredibly active for his age and didn't want to slow down. He was in denial for a long time. He would attend Better Breathing Club meetings and was so optimistic that he eventually wouldn't need oxygen, but that wasn't the reality. He struggled to accept his illness. He didn't want to depend on oxygen. He was determined to get answers about why this was happening to him. He was hopeful he would get an experimental treatment to save his life, but he just kept getting worse.

8. It was emotionally hard to watch him decline so quickly. It was hard not to know how long he would be with us, as the doctors kept changing his life expectancy – first five years, then two years, then one year, then he was gone. Some days I was sad. Some days I was angry. I struggled to watch my dad slipping away, becoming helpless, unable to do the things he could do before, and knowing that I couldn't change anything or do anything to help him. I am heartbroken that I didn't have more time with my dad. He has missed out on graduations, confirmations, music concerts, birthdays and other celebrations. I am sad he will never know how his granddaughters have flourished and how being such a great supporter of my daughter's love of music and gifting her a violin set her on a career in music. I miss little moments of joy, like when my dad would play with my daughters and they would joke around. I feel sad for how I said goodbye to him, not knowing that the last time I saw him would be the last. I wish he could have hugged both my daughters before he died. I wish I could have brought him one last ice cream sundae before he died, a treat he loved. It was even harder to watch my father's illness and death because my own husband, a NYPD officer, was present on 9/11, was hospitalized for breathing issues, and now suffers from respiratory problems. It petrified me when it happened to my dad, and it petrifies me now.

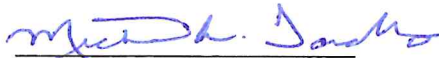
9. I feel sad because we were robbed of time with my dad and we can never get that back. Before his illness, nothing stopped him. You would never know his age because he was so active and up for any adventure, like sneaking away for trips or fun outings to Six Flags theme parks. After his illness, he was no longer carefree and struggled to live a full life because he was tied to his oxygen tank and inhalers. It was not the life my dad deserved to live. My kids

and I miss him every day and often talk about him and how wonderful he was. He will never be forgotten.



CATHERINE M. TROTTA

Sworn to before me this
23rd day of May, 2022



Notary Public

MICHAEL A. TARALLO NOTARY PUBLIC, STATE OF NEW YORK Registration No. 01TA6399390 Qualified in Westchester County Commission Expires October 21, 2023
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Catherine E. Murray

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
CATHERINE E. MURRAY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

CATHERINE E. MURRAY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 171 Kingsley Avenue, Staten Island, New York, 10314.

2. I am currently 67 years old, having been born on January 28, 1955.

3. I am the wife of John Murray, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On April 30, 2008, my husband John died from colon cancer at age 52. It was medically determined that John's cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I had a great relationship. He was the love of my life. I thought we were going to grow old together. We got along great and had the same goals and dreams. Our whole lives revolved around the family unit, the four of us. Before our children were born, we bought a house together, which we affectionately called the "handyman special." John was the ultimate handyman and I was his helper. But that exemplifies everything we did, working on so many projects together. I would hold the sheetrock and measure, and John would do the cutting.

Our dream was to get a broken-down shack on the Jersey Shore and restore it, so that we would have a fun place to visit with our children and grandchildren. We loved each other's company. On every trip, John did the driving and I would navigate. We were a great team.

6. Since John's birthday was on Labor Day weekend, every year we would go to Lavallette on the Jersey Shore for the Murray family reunion. Each year, I took the same photo with John and our children, Dennis and Erin, at the table blowing out the candles on the birthday cake so we could watch them grow.

7. John, a fireman with the FDNY, was not scheduled to work on September 11, 2001; however, after the attack, he was immediately called down to work and arrived at the site after the second tower fell. My husband was covered head to toe in soot and didn't come home that day until around midnight. After frantically looking for his two best friends, also firemen, he found out that they were missing and presumed dead. The same night, after John returned home, he went to visit their wives and updated them on the tragedy. John would work 12-hour shifts at the World Trade Center site for the remainder of September, 2001, with all of the toxic dust continuing to circulate in the area. After the terrorist attacks, despite being the most light-hearted, good humored man in the world, the twinkle in his eyes was gone.

8. Right after 9/11, John got sick almost immediately and had developed a terrible cough. He would get bronchitis all the time. In June, 2005, John went to see Dr. David Prezant, the chief pulmonologist for the FDNY. Dr. Prezant sent my husband for a CAT scan, which showed lung nodules, and later diagnosed John with a myriad of respiratory illnesses, including COPD, emphysema, asthma, GERD and obstructive sleep apnea (OSA). In April, 2006, John was forced to retire under the lung bill and received a 3/4 disability pension based on his pulmonary conditions. Upon retirement, John looked miserable and was always out of breath and fatigued, even after climbing just one flight of stairs. During a follow-up on the lung nodules in 2007, a PET scan revealed that John had Stage IV colon cancer that had metastasized to his liver. The scans showing the colon cancer also revealed that his liver was filled with innumerable tumors. On June 26, 2007, John had a colonoscopy at Sloan Kettering. We were told that the situation was so dire that he should return the following day. The following day, the doctors recommended commencing chemotherapy immediately. As a result, we couldn't leave the hospital until much later. That day happened to be our daughter Erin's 16th birthday, making

everything all the more heartbreaking.

9. John was a strong athletic individual, and it was hard to see him weakened from all of the respiratory ailments that followed. After he was forced to retire, I thought he would begin to feel better and that we may enjoy some time together. Unfortunately, he didn't enjoy one minute of it and would essentially go out only to visit the doctors. I had to take a leave of absence from my job to accompany John to his chemotherapy treatments, holding each other's hands on the ferry to get to Sloan in the city. By September 2007, I became even more involved in John's care because he suffered a blood clot, and I would need to inject him with a blood thinner (Lovenox) twice a day. Unfortunately, in November 2007, the doctors informed us that the cancer was inoperable because the tumors had covered the entire liver, not leaving any space to remove a part of the liver in surgery. From that time on, I was essentially providing hospice care to my husband, who rested in a hospital bed in our living room. A few days before John passed away, I was with my son, Dennis, and the parish priest came to administer his last rites.

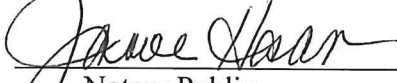
10. When John became sick, we had to stop renting the apartment and lost the additional rental income. John retired from the fire department under the lung bill. Previously, if a fireman retired on disability, you have to die under what you retired for in order for the family to continue to get pension and medical coverage. Since, we knew John was going to die of cancer, we called the union, who informed us that because he was on disability he couldn't be reclassified until after his death. For a time, pending reclassification after my husband's death, I had no pension and no medical coverage. We encountered another problem regarding life insurance that resulted from John's untimely retirement. We didn't realize that the amount of life insurance John had through the union drops upon retirement. Then, even though John bought additional life insurance at great cost, the insurance company contested the claim since it was submitted within only two years of the origination of the policy.

11. The cancer diagnosis was a total shock, and I was terrified about the impact this would have on me and our children. After the chemotherapy, John had neuropathy that was so bad he couldn't even button his shirt. A big strapping fireman lost so much weight. A man who was six feet tall and 220 lbs. went down to 150 lbs. John was kind, easygoing, and the best husband and father anyone could ask for. My husband did his job on 9/11, and it cost him his life and it cost me everything. All our plans died with him that day. He suffered for years

emotionally and physically. It hurts me so much that John didn't get to see his children grow up to be the wonderful people they became, that he didn't get to see their graduations from high school and college, and that he didn't see his son walk in his footsteps and graduate from the FDNY Academy. When Erin was married, John wasn't there to walk his daughter down the aisle and, while it was a happy day for her, I know she felt the loss. John will never meet his two granddaughters, or the third granddaughter on the way. When I was diagnosed with my own cancer in 2017, not having John here to support made things extremely difficult. Now, every happy occasion is bittersweet as I'm reminded of my husband's absence.


CATHERINE E. MURRAY

Sworn to before me this
6 day of April, 2022


Notary Public

JANICE HAAN
Notary Public, State of New York
No. 01HA5063972
Qualified in Richmond County
Commission Expires August 5th, 2022

Dennis J. Murray

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
DENNIS J. MURRAY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

DENNIS J. MURRAY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 627 Metropolitan Avenue, Apt. 2, Staten Island, New York 10301.

2. I am currently 32 years old, having been born on May 15, 1989.

3. I am the son of John Murray, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of colon cancer on April 30, 2008. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 18 years old when my father died. He and I had a very close relationship and, because he was such a wonderful dad, I had a great childhood. My dad was always a coach on my sports teams growing up. When he coached my basketball team, we won a few championships, even though we were the underdogs. In addition to being a great coach, my father was also a knowledgeable handyman and had lots of projects around the house. I have lots of good memories helping him with projects around the house, and I learned a lot from him

along the way. We did everything together. I especially liked the father-son camping trips with his friends and their sons. I looked up to him, and we had a really tight bond.

6. On September 11, 2001, I was just twelve years old. Nevertheless, I can remember my mom taking me out of school and telling me that dad was sent to Ground Zero. My father was a fireman in lower Manhattan. In 1997, he was promoted to Lieutenant and assigned to Staten Island; however, on 9/11 he was called in to support the response to the attacks. We didn't hear from dad all day but had heard that his best friends were confirmed missing and knew it must have been tough for him. When he came home, he was standing in the kitchen, covered in white dust from head to toe. When he went into the bedroom with my mother, I went by the door to listen, and it was one of the only two or three times I heard him cry. I knew he was crying because he knew his friends, who he grew up with and worked with, were gone. In the weeks that followed, my dad would return to Ground Zero and continue to be exposed to the toxic dust. After his work on 9/11 and for the rest of that September, my dad continued working on 9/11 relief efforts in Staten Island.


7. I was around 17 years old when I learned of my dad's diagnosis. My mother said she needed to speak with me and told me about my father's cancer. I could see my father's health was declining even before I knew about the diagnosis. We used to shovel the driveway together after every snowfall; however, after he became sick with his respiratory problems (before the cancer diagnosis), I could see my dad would become short of breath very quickly and would have to return inside. After the diagnosis, I went away to college and would return every break and observe my dad looking thinner and older. This was so unusual because he was always maintained a youthful appearance, making his friends jealous of a full head of hair (no grays). This was readily apparent to me, having been away for months at a time and then returning home.

8. I was so hurt knowing my dad was sick and suffering. In fact, I was so distracted in school that I almost failed out of my first year of college. Fortunately, some of the professors took mercy on me. I had to leave school early in the first year to take care of my dad since it was difficult for my mom to lift him out of bed and take him to the bathroom.

9. I'm proud to follow in my father's footsteps and be a fireman. When I go to work, I feel like a part of my dad is with me. My work gives me great satisfaction, and I'm glad that

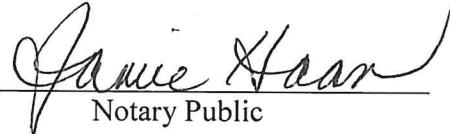
I'm continuing work that my father loved so much.

10. My dad had to search for his closest friends. He was never the same emotionally after 9/11. I was only 18 when I lost my father and feel shortchanged in a big way. Now, as an adult, my wife and daughter never even met my father. Since my wife and daughter, now 7, are such a big part of my life, it's hard to believe they never met my dad. Every day, I think about my dad and am reminded of him all the time. Since my dad taught me how to drive, I'm reminded of him when I think about how I drive my car. Also, when my wife notices my smirk or a facial expression I picked up from my dad, I have to explain its origin and then I'm crushed when I'm reminded that they never met.



DENNIS J. MURRAY

Sworn to before me this
6 day of April, 2022


Notary Public

JANICE HAAN
Notary Public, State of New York
No. 01HA5063972
Qualified in Richmond County
Commission Expires August 5th, 2022

Erin Murray

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
ERIN MURRAY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

ERIN MURRAY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 9 Dekay Street, Staten Island, New York 10310.

2. I am currently 30 years old, having been born on June 27, 1991.

3. I am the daughter of John Murray, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of colon cancer on April 30, 2008. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was only 16 years old at the time of my father's death. He and I had a great relationship. He was hilarious and was always so much fun to be around. Growing up, we would play outside together, play basketball, go to the beach, and build snow forts in the winter. Whenever he wasn't at work, dad made a lot of time for me. Since my dad was constantly working on projects around the house, he would teach me how to help and deputized me as his assistant. He was always patient with me, as he taught me how to do the work. Looking back, I

was definitely the only kid in school who knew how to hang sheetrock. Since we lived in a two-family house, which my parents purchased as a fixer-upper, there were always parts that needed a lot of maintenance.

6. I was in the 5th grade on September 11, 2001 but still have some clear impressions of our experience from that day. I remember my dad arriving home late that night and his whole demeanor changed. He was so sad because his two best friends died that day. When my dad kept returning to the site, I knew he was going there to look for them, and dying in the process. I felt bad that he had to keep returning there.

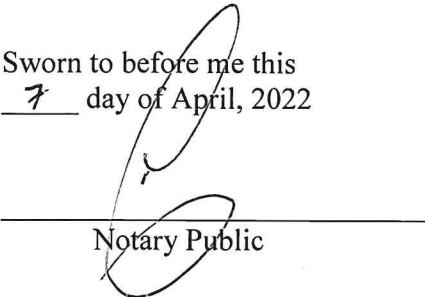
7. My dad slowed down a lot in the years after 9/11. We could definitely could see he was becoming ill. Since I was so young, I didn't realize how sick he was until he was diagnosed with cancer. I do remember exactly when I learned of my father's diagnosis because it was on my 16th birthday in 2007. It was also the day he started chemotherapy.

8. At the time my father died, it was so hard, because I was a junior in high school and preparing to go to college. Then, he died and I felt guilty for going to college at SUNY Albany and leaving my mom alone. My dad's cancer and passing had a big impact on our lives. For my brother, he followed in my dad's footsteps and became a fireman. For me, it factored into my decision to become an oncology nurse.

9. After my dad passed away, I believe he would be proud of the woman I've become and all that I've accomplished. I'm married and have a one-and-a-half-year-old daughter. Currently, I'm expecting another child in July. I wish my dad were here to see my family grow. My daughter is so funny, and I know she would have gotten along so well with my dad. I miss him every day.


ERIN MURRAY

Sworn to before me this
7 day of April, 2022


Notary Public

Robyn Marie Hernandez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

Plaintiffs,

AFFIDAVIT OF
ROBYN MARIE HERNANDEZ

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

ROBYN MARIE HERNANDEZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 112 Grand View Drive, Toms River, New Jersey 08753.
2. I am currently 58 years old, having been born on January 7, 1964.
3. I am the sister of John "Jack" Waugh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My brother passed away from brain cancer on March 29, 2017, at the age of 50. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I'm the oldest of four children, growing up with one younger sister, Karen, and two younger brothers, Jack and Ray. We were a very close family, and I have good memories from our childhood as well as our lives after having started our own families. In the years before my brother Jack became ill, Jack and his wife, Megann (Meg), lived in Aberdeen, New Jersey, just a short forty-minute drive from my home in Toms River. This was nice because it enabled us to see each other on a regular basis in addition to holidays, birthday celebrations, as well as other parties and social gatherings. When I got married, I was glad that Jack got along well with my husband and that they even became good friends. My husband and I enjoyed boating and before Jack and Meg had their daughter, Charlotte, they would join us on the boat on the weekends during the summer. This gave Jack an opportunity to go fishing, which he really loved. We had so many good memories of doing things like that with Jack and Meg. My brother was just a very funny, easygoing guy, and it was always just a pleasure to be around him. My brother's good sense of humor was especially nice since I had two children who absolutely adored Uncle Jack. He was good with all the kids and became close to his niece and nephew. Even when my brother was undergoing chemotherapy, he was able to act as my son's confirmation sponsor. He was a big part of their lives, as well as ours.

6. On September 11, 2001, the whole country was shocked by what had taken place at the World Trade Center. This was a particularly devastating event for me because my husband had been in the towers when it was bombed in 1993. After my parents told my husband and me that Jack had volunteered to go down to the World Trade Center following the attacks, my husband said to me, "I don't think that's a good idea," indicating that there were lots of open questions as to the safety of the environment in addition to the chaotic nature of the emergency operations. My husband was comparing 9/11 with his own experience working on repairs

following the attack in 1993, noting that the nature of the earlier attack allowed for greater precautions in terms of hazmat whereas after 9/11, nobody really understood what they were walking into. Despite the dangers, my brother felt strongly about contributing to the relief efforts and spent over a week at Ground Zero. Moreover, Jack took great pride in his work at the World Trade Center. Anytime I asked him what it was like there, he would smile and just say he was glad he could help. In more private man-to-man conversations with my husband, Jack revealed that he was glad that his father was not down there, stating that there were things he saw there that are impossible to erase from his memory, including gruesome sights of remains cast around the wreckage.

7. My brother discovered he had cancer after experiencing a frightening seizure while working on the Bayonne Bridge. This resulted in his hospitalization and subsequent MRIs, which revealed a brain tumor. The time that my brother was diagnosed with brain cancer was a very crazy time in our lives. About one week before Jack's seizure, I had been diagnosed with a brain tumor as well. I had fallen and needed a CAT scan, which showed the tumor. While I had the scan in Philadelphia, by the time Jack had his scan, my husband and I went up to New York to be with Jack for his treatment. My mom said to me that the feeling was surreal because two of her children were confronting brain tumors. While both my brother and I had surgery, my brother's cancer was malignant, and the tumor they removed from me was benign. Jack's surgery was on December 15th and mine was just two weeks later in Philadelphia.

8. Having spoken with my doctors regarding Jack's glioblastoma, my husband and I knew in the back of our minds that it was a terminal illness, even though they reported significant improvement after his surgery. Despite what my doctor told us, after one and a half years of treatment, including chemotherapy, we thought Jack might be strong enough to beat his

cancer. However, as time went on, and his condition worsened, we knew the outcome would still be terminal. I can remember at one point, after seeing Jack in pain in the hospital, just praying for God to take him because I couldn't see him suffer anymore. And it wasn't only that, it was on a day-to-day basis that all of us would be there with him. It was probably the worst time in my life because I had to watch my parents suffer throughout the whole experience. To Jack's credit, throughout the experience, he didn't complain or say, "why me," and he always maintained a positive outlook. While we have survived without him for over five years, life just isn't the same without my brother. It's a heartache that never goes away. I would describe the feeling as like somebody cut my arm off the day that he died ... and I'm still living without that arm. None of us will be fully whole without Jack back.

9. Constantly worrying about my brother's health was emotionally draining and physically taxing. We would wake up every morning prioritizing anything Jack needed above all else. With my husband retired at the time and me working part-time, we were both accessible to help Jack, Meg, and my parents virtually anytime. It was pretty painful to confront my brother's condition, whether he would wake up in the hospital, or rehab, or at home, because every day we would see a little more of a decline. This was difficult to face because we were such a close family and knew how much we would feel Jack's loss. At the same time, as a family we drew a lot of strength from that closeness. I remember on one occasion visiting Jack in the hospital. My husband and I were leaving, after staying with Jack in the morning, and saw my brother Ray, as we left the room. I joked with him that he was ready to start the "second shift." Immediately afterward, we said to each other that, while we're sad that Jack was in the hospital, we were happy to accept our responsibility to be there, and we wouldn't miss it for anything, no matter how painful it is.

10. I'm saddened when I think about all the things Jack has missed since the time he passed away. His daughter was only about five years old when he passed away, and he missed everything from her first communion to her dance recitals. I feel awful knowing that they went through so much waiting and heartache, and finally, they adopt this beautiful baby and then my brother passed away. Things like that are just so painful because he should be here. Now, when we have family get-togethers, barbecues, and dinners, my brother's absence is always felt. But to keep his memory alive, we always talk about happy moments or the things that Jack did to make us laugh, because I know that he wouldn't want us to be sad all the time. Rather, he would have wanted us to reminisce on the good memories we share.

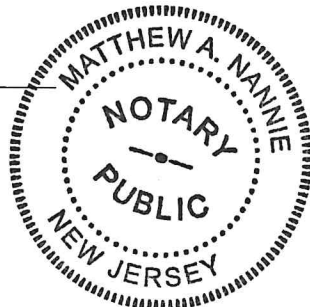
11. Cancer will always be a horrible word; although, there are times today when it's not a death sentence. This gave our family hope during the time Jack was battling brain cancer, and at times we felt optimistic. The reality is that for us, never in a million years did we think that we would lose him. Remember, Jack died when he was only 50! Sometimes, it still doesn't even seem real. One thing's for sure, there's a pain and heartache that will always be with us.

Robyn Marie Hernandez
ROBYN MARIE HERNANDEZ

Sworn to before me this
15 day of June, 2022

Matthew A. Nannie
Notary Public

MATTHEW A. NANNIE
NOTARY PUBLIC, NEW JERSEY
MY COMMISSION EXPIRES OCTOBER 13, 2025



John Charles Waugh

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

AFFIDAVIT OF
JOHN CHARLES WAUGH

20-CV-00340 (GBD)(SN)

JOHN CHARLES WAUGH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 113 Grand View Drive, Toms River, New Jersey 08753.
2. I am currently 81 years old, having been born on January 4, 1941.
3. I am the father of John “Jack” Waugh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My son passed away from brain cancer on March 29, 2017, at the age of 50. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Jack and I had a great father-son relationship. We played on the same softball team with my other son, Ray, as well as my son-in-law, Billy. Jack and I frequently went to Yankees games together. After Jack got married, he later adopted a daughter. I was always so proud of him and happy to play such an important part in the family. I was thrilled to have a chance to become close with my granddaughter. I had a career as an ironworker for many years. I never wanted Jack to get into the ironworker trade because it was a dangerous profession. However, after many years of him pestering me about it, I finally had him admitted into the union. I always feared he'd have a fall or something of that nature, but I never in a million years thought that he would develop cancer. Despite my worries, I was extremely proud that Jack followed in my footsteps and ultimately became a very well-respected ironworker. He worked his way up to junior foreman, or what we would call "pushers." That gave him the chance to have his own group of workers and maintain a high level of respect amongst his co-workers.

6. After 9/11, I volunteered to go down to the World Trade Center with him, but he told me it wasn't necessary. However, he did stop by the house and asked if I had an extra mask. Since we had been working on the 59th Street Bridge together a short while before 9/11, Jack thought I might have one. Unfortunately, I didn't. Jack went down to Ground Zero and continued to volunteer there for at least another week.

7. Upon returning from the gym one cold December day, I received a call saying that Jack suffered a seizure while working a job on the Bayonne Bridge and was taken to a hospital in Staten Island. This call took me totally by surprise. Jack then informed me that he had been diagnosed with cancer. His doctor at Columbia Presbyterian performed an operation to remove the tumor. After the surgery, Jack's doctor, who was highly regarded, gave us some glimmer of hope by telling us that the operation was a success. Unfortunately, that was short


lived. As the cancer progressed, Jack started to deteriorate and was in pretty rough shape. When Jack was in the rehab center, he would do physical therapy daily. Jack was a real gym rat and was quite built, but he had a rough time concentrating on the exercises and had difficulty lifting weights while in physical therapy. To me, that was indicative of the seriousness of his condition.

8. Our family, including Jack's wife, was extremely worried about the amount of care Jack would need as his cancer progressed. My wife and I would take turns going with Jack to chemotherapy every Friday. We would sit with Jack and Megann during his treatment, just to be together. It was quite painful to watch my son receive his chemo and witness how much it weakened him. Since Jack had always been so strong, we thought he would be able to beat the cancer. Sadly, that was not the case. First and foremost, Jack was my son. But when he passed away, I was reminded that I lost a true friend and partner who had made a huge impact on my life. No parent should lose a child. It's heartbreaking to go through.

9. Completing this affidavit in and of itself is quite painful for me. I'm reminded of that extremely emotional period in my life. My son was such a loving and incredibly hard-working person. After years of experience as an ironworker, he became a foreman and would have continued to earn a strong income had he been able to beat his cancer. Jack left behind a loving wife and daughter who can never be made whole in his absence. I don't believe that any of us will ever truly get over his death.


JOHN CHARLES WAUGH

Sworn to before me this
31st day of May, 2022


Notary Public

